



International Union Of Operating Engineers International Environmental Technology And Training Center

Frank Hanley
General President

December 9, 1999

The Chairman and Board Members
U.S. Chemical Safety and Hazard Investigation Board
2175 K Street N.W.
Suite 400
Washington, DC 20037-1809

Dear Mr. Chairman and Board Members:

I am an Industrial Hygienist and I work for the Operating Engineers National Hazmat Program. Our organization, located in Beckley, West Virginia has trained over 120,000 workers under OSHA's hazardous waste worker requirements. We specialize in training heavy equipment operators to safely work on hazardous waste sites.

Over the last 4 months we have mounted a major campaign to train stationary engineers – our members who operate boilers and HVAC equipment in buildings and power plants - about the potential problems they may face during the Y2K transition. We have thousands of members working in huge chemical plants and petroleum operations in Texas, Louisiana, and Oklahoma.

The Chemical Safety and Hazard Investigation Board has played a critical role in the training of these stationary engineers. Dr. Gerald Poje provided several hours of training on the status of the chemical industry to our Y2K advisory board during a workshop in Beckley on October 30th. The information on Y2K generated by Dr. Poje through the Chemical Safety Board has been the primary source we have relied on for informing our members. His efforts have been exemplary on this issue.

Given the impending Y2K deadline of December 31st and the risks faced by our members, the present difficulties of the Chemical Safety Board are extremely disconcerting. We urge the Board to resolve the issue of governance following the recommendations of Senator Lautenberg in his December 1st letter. His role in drafting the statute which created the Board affords him a unique and authoritative perspective on this current impasse.

The Board can provide a critical service to our members that we would like to see fully realized. Thank you.

Sincerely,

Bruce Lippy, CIH, CSP
Industrial Hygienist